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Subject:	Credit Checks for Youth 16 and 17 Years Old in DCF Custody	Page 1 of 4
Approved:	Cynthia K. Walcott, Deputy Commissioner	Effective: 6/18/2014
Supersedes:	Family Services Policy No. 138, Credit Checks for Youth 16 and 17 Years Old in DCF Custody	Dated: 3/28/2014

Purpose

To outline the methods for adhering to federal regulations specific to ensuring youth aged 16 and 17 who are in DCF custody receive an annual check on their credit history.

Introduction

On September 30, 2011, the President signed the “Child and Families Services Improvement and Innovation Act” into law. Among the other provisions, the Improvement and Innovation Act amends the case review system definition to require each youth age 16 and older in foster care receive a copy of any consumer credit report annually until discharged from foster care and must be assisted in interpreting the credit report and resolving any inaccuracies as referenced in Section 475(5)(I) of the Social Security Act.


Building and maintaining credit is vital to successful transition from foster care. Information on credit reports is used to evaluate applications for credit, employment, insurance, and renting or buying a home. Monitoring credit reports is one of the best ways to discover identity theft. No youth under the age of 18 should have a credit history unless their information has been used fraudulently.

Policy

The Family Services Division will work with the following three credit reporting bureaus, Equifax, Experian, and TransUnion, to provide and assist all youth aged 16 and 17 in foster care in determining if they have a credit (history) report, by requesting a credit report for them. As minors, youth under age 18 cannot legally secure credit on their own behalf. If the credit report request does indicate a credit history, this is evidence that identity theft may have occurred.

Family Services will have a centrally located administrative staff person to manage the credit check process. This individual shall be responsible for the following

- Conducting a monthly database query to identify youth turning 16 and 17 during the previous month.

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- Completing formal requests with all three credit bureaus for all youth identified by the query process.
- Monitoring receipt of reports resulting from request.
- Conveying results to the Family Services social worker, administrative assistant, supervisor and district director.
- Initiating the remediation process with the respective credit agencies for youth under aged 18 with identified credit report issues.
- Conveying information to social workers with youth whose credit reports contain identified issues which represent real costs incurred by the youth.

Legitimate Fines Incurred by Youth


Children and youth in custody under the age of 18 are minors and therefore are not legally capable to enter into contracts on their own behalf and as a result are not able to incur debt reflected on a credit report. There are some limited exceptions to this in the case of juvenile court orders for fines, or restitution which may appear on a youth's credit report. In cases where fines exist that are the responsibility of the youth, this information will be communicated to the assigned social worker to work with the youth on an appropriate payment plan.

Identity Theft

The primary purpose of the credit check for under age foster youth is to discover if they are a victim of identity theft. In cases where credit reports are run consistent with this policy and indicate an issue (often referred to as a "hit") that is not a court ordered fine, the central office administrative staff person requesting the credit report will initiate a series of steps with the Credit Reporting Agencies (CRA) to remove the credit report "hits" and protect the youth's credit from further identity theft.

Remediation Efforts Following a Youth's 18th Birthday

There are times that remediation efforts to correct fraudulent entries on a youth's credit report are not resolved prior to the youth turning 18 and leaving DCF custody. In these cases, the youth will be provided with all the pertinent information to continue remediation efforts. This information should be provided to the youth no later than 90 days prior to the youth's 18th birthday. This information will be discussed at the youth's "90 Day" exit meeting.

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Resources

[Federal Trade Commission-Consumer Information on Child Identity Theft](#)

[Federal Trade Commission-Consumer Information on Identity Theft](#)

[Federal Trade Commission-Guide for Identity Theft Victims](#)

[Annie E. Casey Foundation's Youth and Credit Report](#)

[Annie E. Casey, Accessing Credit Reports for Foster Youth](#)

[Annie E. Casey, Youth and Credit: Protecting the Credit of Youth in Foster Care](#)


Tasks:

Central Office Administrative Assistant:

- Conduct monthly database query to identify youth who have turned 16 and 17 during the previous month.
- Complete formal requests with all three credit bureaus for all youth identified by the query process.
- Monitor receipt of reports resulting from request.
- Convey results to the Family Services social worker, administrative assistant, supervisor and district director.
- Initiate the remediation process with the respective credit agencies for youth under aged 18 with identified credit report issues.
- Convey information to social workers with youth whose credit reports contain identified issues.

Social Worker Tasks:

- Social worker shall record in case files and on the Over 14 case plan the completion and results of credit reports for all 16 and 17 year old youth in custody upon receipt of this information from the central office administrative staff person requesting the reports.
- If the central administrative staff person is unable to obtain a copy of the youth's custody order, the social worker will provide this to the central office staff person.
- If an issue arises where a youth has incurred an expense (such as a court fine) that is legitimate, the social worker will assist the youth in creating a payment plan and remediating this issue.

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- If the youth will turn 18 prior to the completion of remediation efforts, the social worker will provide all pertinent information to the youth at least 90 days prior to their 18th birthday and discuss at the “90 Day” exit meeting.

Supervisor Tasks:

- Monitor the completion of credit checks based on the receipt of monthly reports as outlined in the administrative tasks section of this document.
- Monitor the incorporation of the credit check results into the youth’s case file and the Over 14 Case Plan.
- In cases where the credit check indicated the fines have been incurred by the youth, monitor and support the remediation of those issues by the social worker in coordination with the youth.

District Director Tasks:

- District director shall monitor the overall administration of this process in accordance with this policy.